

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA**

**SOUTHERN DISTRICT OF FLORIDA
CASE NO. 97-3654-CIV-JORDAN/BANDSTRA**

AMERICARE DIAGNOSTICS, INC.,
a subsidiary of AMERICARE
HEALTH SCAN, INC., AMERICARE
TRANSTECH, INC., INTERNATIONAL
MEDICAL ASSOCIATES, INC., and
JOSEPH P. D'ANGELO,

Plaintiffs,

vs.

TECHNICAL CHEMICALS AND
PRODUCTS, INC., JACK L.
ARONOWITZ, SIMPLEX MEDICAL
SYSTEMS, INC., ANALYTE
DIAGNOSTICS, INC., HENRY B.
SCHUR, and SMLX TECHNOLOGIES, INC.

Defendants. _____/

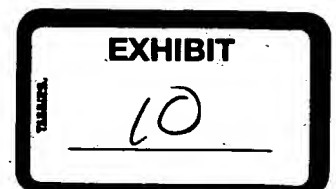
SUBPOENA FOR DEPOSITION DUCES TECUM

THE STATE OF INDIANA:

TO: JOEL MITCHEN
3834 Oak Lake Cir. S
Indianapolis, IN 46268

YOU ARE COMMANDED to appear for deposition, before a person authorized to take depositions, at: **John E. Connor & Associates, 1860 1 American Square, Indianapolis, IN on December 30, 1999 at 10:00 a.m.** You are to bring with you at the time and place of the deposition the following:

SEE ATTACHED SCHEDULE "A".



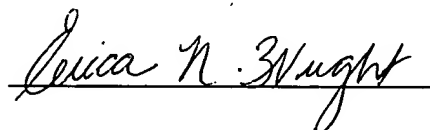
CASE NO. 97-3654-CIV-LENARD/BANDSTRA

Your formal deposition will be taken as it relates to this case pursuant to Fed. R. Civ. P. 30. You have the right to object to the deposition pursuant to this subpoena within (14) days by giving written notice to the attorney whose name appears on this subpoena. If you fail to:

1. appear for your deposition; or
2. object to this subpoena;

you may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

ERICA WRIGHT, ESQ.
Florida Bar No. 125253
For the Clerk of the Court



Attorney for Plaintiffs
ERICA WRIGHT, ESQ.
Florida Bar No. 125253
PATRICIA KLEIN, ESQ.
Florida Bar No. 975516
MIYOSHI D. SMITH, ESQ.
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Facsimile: (305) 770-1252
E-mail: amerlaw12@aol.com

SCHEDULE "A"

1. All documents¹ pertaining to² your employment with Technical Chemicals & Products, Inc. (TCPI) including any subsidiary or division, officer, director, employee, attorney or agent of said Corporation.
2. All documents pertaining to Technical Chemicals & Products, Inc.'s T.D. Glucose Technology.
3. All documents pertaining to Henry B. Schur.
4. All documents pertaining to Technical Chemicals & Products, Inc.'s transdermal technology for the collection of glucose.
5. All documents pertaining to Technical Chemicals & Products, Inc.'s Pharmetrix Division.
6. All documents pertaining to Patent No. 5,462,064.
7. All documents pertaining to any confidentiality agreement that you have or had with Technical Chemicals & Products, Inc. or any company acquired by Technical Chemicals & Products, Inc.
8. All documents pertaining to the noninvasive collection of body fluid(s), including the noninvasive transdermal collection of body fluid analytes, pursuant to any invention, device or method developed or invented by Technical Chemicals & Products, Inc. and/or its Pharmetrix Division.
9. All documents pertaining to Americare Health Scan, Inc., Americare Diagnostics, Inc., Americare Transtech, Inc. and Dr. Joseph D'Angelo.

¹The word "document" shall mean any writing, recording or photograph in your actual or constructive possession, custody, care or control, which pertain directly or indirectly, in whole or in part, either to any of the subjects listed below or to any other matter relevant to the issues in this action, including, but not limited to: correspondence, memoranda, notes, messages, diaries, minutes, books, reports, charts, legends, invoices, computer printouts, micro films, video tapes or tape recordings.

²The words "pertain to" or "pertaining to" mean: relates to, refers to, contains, concerns, describes, embodies, mentions, constitutes, constituting, supports, corroborates, demonstrates, proves, evidences, shows, refutes, disputes, rebuts, controverts or contradicts.